

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SIETEL SINGH GILL, individually and on behalf  
of other similarly situated individuals,

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE, and NFL  
ENTERPRISES LLC,

Defendants.

Case No. 1:21-cv-01032-PAE

**DECLARATION OF THOMAS A. LEGHORN**

**THOMAS A. LEGHORN**, declares, pursuant to the provisions of 28 U.S.C. § 1746:

1. I am a member of the firm of London Fischer LLP, attorneys for Defendants NATIONAL FOOTBALL LEAGUE and NFL ENTERPRISES LLC (“Defendants”). I am fully familiar with the facts and circumstances of this case from my personal knowledge and my review of the file for this matter maintained in my office.

2. This Declaration and the attached exhibits are submitted in support of Defendants’ Motion for Summary Judgment of Plaintiff’s First Amended Class Action Complaint [Doc. No. 23] pursuant to Fed. R. Civ. P. 56.

3. Attached hereto as **Exhibit “A”** is a true and accurate copy of Plaintiff SIETEL SINGH GILL’s (“Plaintiff” or “Gill”) First Amended Class Action Complaint filed in this action on April 30, 2021 [Doc. No. 23] (“Amended Complaint”).

4. Attached hereto as **Exhibit “B”** is a true and accurate copy of Defendants’ Answer to the Amended Complaint, Affirmative Defenses, and Jury Demand filed in this action on December 7, 2021 [Doc. No. 58].

5. Attached hereto as **Exhibit “C”** is a true and accurate copy of the Subscription Products Terms and Conditions, updated on August 6, 2014.

6. Attached hereto as **Exhibit “D”** is a true and accurate copy of the Subscription, Authentication and Mobile Products Terms and Conditions, updated on July 31, 2015.

7. Attached hereto as **Exhibit “E”** is a true and accurate copy of the August 2018 Suite of Terms.

8. Attached hereto as **Exhibit “F”** is a true and accurate copy of the transcript of the March 4, 2022 deposition of Max Boigon.

9. Attached hereto as **Exhibit “G”** is a true and accurate copy of the transcript of the March 23, 2022 deposition of Plaintiff.

10. Attached hereto as **Exhibit “H”** is a true and accurate copy of a screen shot of the “NFL Game Pass International” application, produced in this case as DEF0001393.

**WHEREFORE**, it is respectfully requested that this Court grant Defendants’ Motion for Summary Judgment in its entirety pursuant to Fed. R. Civ. P. 56; and grant such other, further and different relief as this Court deems just and proper.

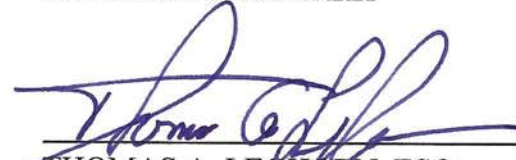
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Dated: New York, New York  
May 16, 2022

Respectfully submitted,

LONDON FISCHER LLP

By:

  
THOMAS A. LEGHORN, ESQ.